

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: STEPHEN MICHAEL FARKAS : CHAPTER 13  
Debtor(s) :  
 :  
CHARLES J. DEHART, III :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
STEPHEN MICHAEL FARKAS :  
Respondent(s) : CASE NO. 1-19-bk-00181

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 4th day of June, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. Sec. 1325(b)(1) in that the plan does not provide for the payment of all of the debtor(s)' projected disposable income for a minimum period of three years.
2. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Plan provides for adequate protection payment for a claim secured by real estate without justification.
3. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
  - a. Unfiled 2018 Federal Income Tax Return (Claim #1)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones

CERTIFICATE OF SERVICE

AND NOW, this 4th day of June, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kara Gendron, Esquire  
125 State Street  
Harrisburg, PA 17101

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee